

IN THE UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF GEORGIA

ATHENS DIVISION

TERRIE BUCKNER

V.

KAREN SHETTERLEY
DEFENDANT

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CIVIL ACTION FILE

3:06-CV-79

AFFIDAVIT OF STEVE LANIER

COMES NOW Steve Lanier of the law firm of Steve Lanier, P.C., counsel for the Plaintiff in the above-referenced matter, who came before the undersigned officer duly authorized to administer oaths and, after being duly sworn, states the following based upon his personal knowledge.

1.

My name is Steve Lanier. I give this affidavit for all of the purposes allowed by law.

2.

I am an attorney licensed to practice law in the State of Georgia, and was counsel of record for the Plaintiff in the above-referenced matter until the date of trial, October 6, 2008, wherein I withdrew as counsel of record with the permission of this Court and opposing counsel and testified as a witness on behalf of the Plaintiff.

3.

I have practiced law for the past 31 since being admitted to the State Bar of Georgia in 1977. I have since 1977 continuous full-time experience as a trial lawyer. I specialize in criminal law and have also practiced civil rights law since 1997 upon opening my private practice in Rome, Georgia.

4.

I graduated from Woodrow Wilson Law School in Atlanta, Georgia in 1976. While attending law school I worked for the Governor's Office of Consumer Affairs as their first investigator and later as staff attorney. I specialized in the investigation and prosecution of white collar crime in Georgia. I left the Consumer Affairs office in 1979 and became an Assistant District Attorney of the Rome Judicial Circuit for a period of four years. The Rome District Attorney's Office handles both misdemeanor and felony cases and my responsibility was to prosecute both. I left the District Attorney's Office in 1983 to become a staff attorney for the Prosecuting Attorney's Council of Georgia and traveled statewide prosecuting individuals in circuits wherein the local District Attorney was disqualified or requested our assistance. In 1984, I ran for the District Attorney position in Rome and was elected. I assumed that office in 1985 and remained as District Attorney for twelve (12) years until leaving office to practice law in Rome.

5.

I am admitted to practice before all state trial and appellate courts in Georgia, the United States District Court for the Northern District of Georgia, the United States

District Court for the Middle District of Georgia, the United States Court of Appeals and the United States Supreme Court.

6.

I am a sole practitioner of my law firm. With over twenty-three (23) years experience in law enforcement and twelve (12) years as a criminal defense lawyer, I have extensive experience in the investigation and litigation of white collar crime such as in this case. I have been retained to handle these complex cases throughout the southeastern United States.

7.

I was retained by the Plaintiff to handle the criminal matters arising out of her arrest in Gwinnett County for felony counts of theft by taking. I was successful in having these warrants dismissed in July, 2005 by the Gwinnett County District Attorney's Office. After the dismissal, I agreed to continue my representation of the Plaintiff in an effort to pursue a possible civil rights claim for false arrest by UGA officials and law enforcement personnel. In section §1983 actions, I regularly associate law firms that specialize in this area of expertise in order to adequately assist me and my client.

I associated Lee Parks of the Parks Firm in February, 2006 due to his expertise in constitutional law and prior litigation against the University of Georgia. Together we made a very formidable team in both the investigation and litigation involving the wrongful arrest of the Plaintiff.

8.

My standard hourly rate is \$250.00 per hour. I have two paralegals as support staff with their hourly rate being \$100.00 per hour. Even though I charge my clients in a

criminal case on a flat fee basis and not by billable hours, I do represent corporations who retain my services for purposes of investigating and assisting in the prosecution of their former employees and office holders for financial theft. However, I continue to devote significant amount of time in cases taken on a contingent fee basis in reliance upon the various fee shifting statutes which permit the Court to award a full fee in cases where the plaintiff is prevailing party. Due to the complexity of these cases and the inherent financial risks associated with contingent fees, virtually all of the lawyers I had previously associated in Section §1983 cases no longer practice in this area of law. Given that and the importance of these cases, it is critical that lawyers with the requisite skill and expertise continue to work on these very complex and risky cases. That in turn, depends on the availability of fully compensatory awards.

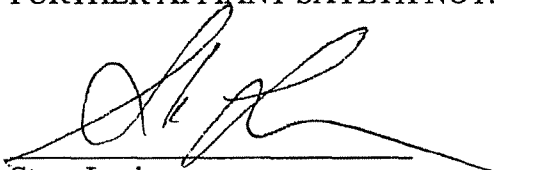
9.

An itemized statement of all time and expenses incurred in this case by myself and staff is attached as Exhibit "A." This time began with the completion of the criminal case, goes through anti-litem notice requirements, attorney selection, discovery, motions for summary judgment and pretrial preparation. The billing statement is a true and accurate statement of the attorney and paralegal time and expenses of litigation attributable to the representation of the Plaintiff in this matter.

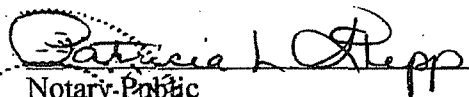
10.

The verdict and judgment in this case is indicative of the significant amount of time and effort of counsel that resulted in this successful litigation. It makes the Plaintiff party entitled to a fully compensatory fee award.

FURTHER AFFIANT SAYETH NOT.


Steve Lanier

Sworn to and subscribed before me
this 22 day of October, 2008


Notary Public


My Commission Expires 7-19-09

STEVE LANIER, P.C.

Attorney at Law

410 East First Street
Rome, Georgia 30161

706/292-0200
Fax: 706/292-9222

Terrie and Gerald M. Buckner
655 Singley Drive
Lawrenceville, GA 30044
USA

Terrie Buckner v. UGA Board of Regents, et al.

Fees

			Rate	Hours	
07/13/05	SFL	Receipt and review D.A. dismissal of charges	250.00	.40	100.00
07/13/05	SFL	Telephone call to client, discussion of dismissal of criminal action	250.00	.50	125.00
07/13/05	SFL	Phone conversation with Attorney Terry Lloyd... re: dismissal of charges in Gwinnett County	250.00	2.00	500.00
07/20/05	SFL	Telephone conversation with Attorney Bruce Millar, re: possible State & Section §1983 action, draft and send to Millar 17 page document outlining facts of case. Legal research of § 1983 case law	250.00	3.00	750.00
07/20/05	ABL	Typing of outline. Retrieval of law applicable to State and § 1983 for review, fax documents to Millar	100.00	2.00	200.00
07/20/05	SFL	Telephone conversation with Attorney David Archer...re: representation options and possible State and § 1983 course of action	250.00	.50	125.00
07/24/05	SFL	Telephone conversation with client re: representation options and course of action strategy	250.00	.50	125.00
07/26/05	SFL	Receipt and review correspondence from Millar, telephone conference with Millar...re: § 1983 laws, State Laws and Anti-Litem Notice requirements	250.00	.80	200.00
07/26/05	ABL	Fax additional information for Millar review...re: Anti-Litem notice	100.00	.25	NC
08/01/05	SFL	Telephone conversation with client...re: Anti-Litem notice, requested additional information for Anti-Litem notice	250.00	.50	125.00

08/15/05	SFL	Draft and send open records request to UGA for police file	250.00	.40	100.00
08/18/05	SFL	Receipt and review from UGA response to open records request	250.00	.20	50.00
08/21/0	SFL	Telephone conversation with client re: open records review	250.00	.50	125.00
08/22/05	SFL	Receipt and review police file – Copy sent by Fed Ex to Client	250.00	1.00	250.00
08/22/05	SFL	Telephone conversation with client...re: police file contents	250.00	.50	125.00
08/22/05	ABL	Copying & preparing police file to Fed Ex to client	100.00	.75	NC
08/22/05	SFL	Research on UGA policy...retrieval of UGA policy on research and fraud for Anti-Litem notice	250.00	2.00	NC
08/30/05	SFL	Telephone conversation with client re: Anti-Litem notice information	250.00	.50	NC
08/31/05	SFL	Research, preparation, draft and editing Anti-Litem notice	250.00	4.0	NC
08/31/05	SFL	Fax to Millar requested information for Anti-Litem notice	250.00	.20	NC
09/01/05	ABL	Gathering names and address for Anti-Litem notice	100.00	1.0	NC
09/02/05	SFL	Telephone conversation with Millar, re: Anti-Litem notice	250.00	.50	NC
09/02/05	ABL	Typing and faxing corrected Anti-Litem notice to Millar	100.00	1.50	NC
09/05/05	SFL	Telephone conversation with clients, re: Anti-Litem notice	250.00	.50	NC
09/07/05	SFL	Receipt and review correspondence from Millar, re: Anti-Litem notice, receipt and review additional information from client ...re: Anti-Litem notice	250.00	.50	NC
09/07/05	SFL	Receipt and review fax from clients...re: DTAE and UGA contract	250.00	.50	125.00
09/08/05	SFL	Preparation, editing, review and sending to Millar's via fax proposed Anti-Litem notice for his review	250.00	1.00	NC
09/08/05	ABL	Typing and faxing proposed Anti-Litem notice	100.00	2.00	NC
09/08/05	SFL	Receipt and review suggestions from Millar on corrections of Anti-Litem notice, editing and correcting notice.	250.00	1.00	NC
09/08/05	ABL	Typing completed Anti-Litem notice, preparation of certified mail and delivery to post office	100.00	2.00	NC
09/16/05	SFL	Receipt and review fax and documents from client...re: similar UGA investigations	250.00	.50	125.00
09/21/05	SFL	Telephone conversation with clients...re: Anti-Litem notice update	250.00	.50	NC

10/11/05	ABL	Preparation and sending to Gwinnett County DA's office open records request on clients file, and sending by certified mail	100.00	1.00	100.00
11/08/05	SFL	Travel to Lawrenceville to review DA's file and to meet with client 4 hours travel, 2 hours meeting with clients	250.00 (travel ½) 250.00 meeting	4.00 2.00	500.00 500.00
11/08/05	ABL	Copying and sending by Fed Ex to clients, DA file	100.00	1.00	NC
11/10/05	SFL	Receipt and review by fax, expungement notice from Client Conference with Client Conference with Lloyd Conference with Client on legal representation...re: §1983 Action Conference with Atty. Archer on representation...re: § 1983 Action Conference with Atty. Millar on representation...re: § 1983 Action Conference with Atty. Lee Parks, re: referral for association In § 1983 action Conference with Client	250.00	3.50	875.00
11/31/05	SFL	Conference with Bill Atkins, re: representation	250.00	.50	125.00
12/01/05	SFL	Receipt and review contract for legal representation from Atkins, faxed contract to client, conference with client	250.00	2.00	500.00
12/09/05	SFL	Telephone conversation with client...re: fee agreement and representation selection	250.00	.50	125.00
12/19/05	SFL	Meeting in Atlanta with Bill Atkins...re: client representation 3 hours travel time, 1 hour meeting	250.00(travel ½) 250.00	3.00 1.00	375.00 250.00
01/04/06	SFL	Telephone conversation with client... re: legal representation selection	250.00	.50	125.00
01/13/06	SFL	Telephone conversation with client...re: legal representation selection	250.00	.40	100.00
01/20/06	SFL	Draft and send correspondence to Bill Atkins, re: contract of legal representation	250.00	.40	100.00
01/26/06	SFL	Conference call with client...re: legal representation selection	250.00	.40	100.00
02/15/06	ABL	Copying and organizing criminal case file for delivery to Atkins	100.00	4.00	NC
02/15/06	SFL	Meeting with Bill Atkins in Atlanta with clients regarding representation, delivery of case file (3 hrs. travel, 1 hr. meeting)	250.00 (travel ½) 250.00 (meeting)	3.00 1.00	375.00 250.00
02/15/06	SFL	Telephone conversation with client...re: Bill Atkins interview	250.00	.50	125.00
02/22/06	SFL	Receipt & review correspondence from Atkins, re: fee agreement and proposed work schedule	250.00	.50	125.00
04/28/06	SFL	Receipt and review E-mails from client and Atkins ... Re: status update	250.00	.50	125.00

05/11/06	SFL	Receipt and review E-mail from client...re: requesting case update	250.00	.20	50.00
05/11/06	SFL	Telephone conversation with client...re: status update	250.00	.50	125.00
06/06/06	SFL	Telephone conference with Bill Atkins...re: case strategy questions and answers	250.00	.50	125.00
06/14/06	SFL	Telephone conference with Bill Atkins...re: Complaint discussions	250.00	.50	125.00
07/01/06	SFL	Telephone conversation with clients...re: questions concerning Complaint	250.00	.50	125.00
07/07/06	SFL	Receipt and review E-mail from Atkins...re: Complaint issues	250.00	.40	100.00
07/11/06	SFL	Receipt, review and make changes to proposed Complaint	250.00	1.00	250.00
07/13/06	SFL	Receipt, and review Complaint with revisions from client	250.00	.50	125.00
07/13/06	SFL	Telephone conference with Attorney Archer...re: Complaint	250.00	.50	125.00
07/18/06	SFL	Reviewed additional changes to Complaint, faxed copy and Anti-Litem notice to Attorney Archer for his review. follow up telephone conference with Archer	250.00	1.00	250.00
07/20/06	SFL	Telephone conversation with Bill Atkins...re: scheduled meeting with insurance investigator Opry and clients	250.00	.50	125.00
07/24/06	SFL	Conversations with Attwood setting up meeting with Opry	250.00	.50	125.00
07/24/06	SFL	Telephone conversation with client...re: Opry meeting	250.00	.40	100.00
07/26/06	SFL	Receipt and review fax from client... re: other UGA complaints and litigation	250.00	1.00	250.00
08/01/06	SFL	Telephone conference with Bill Atkins regarding meeting with Opry and client	250.00	.50	125.00
08/02/06	SFL	Travel to Atlanta meeting with Akins regarding strategy, Opry Meeting and complaint, (3 hours travel, 1 hour meeting)	250.00 (travel ½)	3.00	375.00
			250.00	1.00	250.00
08/02/06	SFL	Telephone conference with client ...re: update on preparation of meeting with Opry	250.00	.40	100.00
08/04/06	SFL	Travel to Atlanta meeting with Atkins, clients and Opry...re: investigator interview (3 hours travel, 1 hour meeting)	250.00 (travel ½)	3.00	375.00
			250.00 (meeting)	1.00	250.00
08/07/06	SFL	Telephone conference with Bill Atkins... re: meeting with Opry	250.00	.40	100.00
08/07/06	SFL	Telephone conference with clients...re: meeting with investigator Opry	250.00	.50	125.00
08/11/06	SFL	Telephone conference with Bill Atkins...re: meeting with Opry and status update	250.00	.40	100.00

09/01/06	SFL	Receipt and review Complaint with revisions from client	250.00	1.00	250.00
09/02/06	ABL	Revisions to Complaint and pulling legal research for review	100.00	2.50	250.00
09/02/06	SFL	Receipt and review E-mail from client...re: revisions to Complaint	250.00	.50	125.00
09/02/06	SFL	Telephone call to client...re: Complaint revisions	250.00	.50	125.00
09/02/06	SFL	Legal research on Complaint	250.00	2.00	500.00
09/02/06	SFL	Review and make changes to Complaint	250.00	1.50	375.00
09/06/06	SFL	Telephone conversation with client...re: Complaint revisions	250.00	.50	125.00
09/06/06	SFL	Receipt and review E-mail from Atkins...re: Complaint revisions	250.00	.50	125.00
09/06/06	SFL	Revision of Complaint	250.00	1.00	250.00
09/06/06	ABL	Fax to Atkins revised Complaint	100.00	.20	NC
09/07/06	SFL	Receipt and review E-mail from Atkins...re: Complaint revisions	250.00	.50	125.00
09/08/06	SFL	Receipt and review final edited revision of Complaint	250.00	.50	125.00
09/11/06	SFL	Receipt and review E-mail from Atkins...re: summons issuance for Williamson, Walls, Dellinger & Shetterly	250.00	.20	50.00
09/11/06	SFL	Receipt and review E-mail from Court...re: filing of Complaint and addition of Judge Royal	250.00	.40	100.00
09/11/06	SFL	Telephone contact with client...re: filing of Complaint	250.00	.50	125.00
09/12/06	SFL	Petition – draft, and send letter to State Bar of Georgia in reference to Admission into Middle District of Georgia Requirements	250.00	.50	125.00
09/12/06	ABL	Preparation of letters, requests, payment of court costs and Petition For Admission to Practice in Middle District of Georgia	100.00	1.50	150.00
09/19/06	SFL	Receipt and preparation of Petition to Plead and Practice in Middle District of Georgia...re clients case	250.00	1.00	250.00
09/21/06	SFL	Receipt and review E-mail from client...re: Higgins exit interview	250.00	1.00	250.00
09/21/06	SFL	Telephone conversation with client...re: Higgins exit interview	250.00	.50	125.00
09/26/06	SFL	Receipt and review e-mail from client...re: informant	250.00	.20	50.00
09/26/06	SFL	Telephone call with client...re: confidential informant Nemic	250.00	.50	125.00
10/02/06	SFL	Receipt and review Answer of Defendants	250.00	.50	125.00
10/09/06	SFL	Receipt and review affidavit of service of each Defendant by process server	250.00	.50	125.00

10/10/06	SFL	Telephone conference with client...Re: Defendant's Answer to Complaint	250.00	.50	125.00
10/11/06	SFL	Telephone conference with client...re: statute of limitations	250.00	.50	125.00
11/10/06	SFL	Receipt and review e-mail from client...re: UGA arrests in other cases	250.00	.50	125.00
11/15/06	SFL	Telephone conversation with clients...re: media coverage	250.00	.50	125.00
11/16/06	SFL	Receipt and review proposed scheduling of discovery order from Court	250.00	.40	100.00
11/27/06	SFL	Receipt and review Arbitration opt out notice by Defendants	250.00	.20	50.00
12/28/06	SFL	Receipt and review proposed scheduling and Discovery order	250.00	.40	100.00
12/29/06	SFL	Receipt and review Court notice...re: error in filing by defendants	250.00	.20	50.00
01/09/07	SFL	Receipt and review e-mail from Atkins...re: proposed scheduling order	250.00	.50	125.00
01/10/07	SFL	Receipt and review e-mail from Court notice...re: scheduling and discovery order to be completed by 5/2	250.00	.40	100.00
1/11/07	SFL	Receipt and review e-mail from Atkins...re: scheduling order	250.00	.50	125.00
01/11/07	SFL	Telephone conversation with client...re: scheduling order	250.00	.50	125.00
03/20/07	SFL	Receipt and review Gwinnett County DA's office correspondence to Williamson...re: notice of dismissal of charges	250.00	.40	100.00
03/20/07	SFL	Telephone conversation with clients...re: DA correspondence	250.00	.40	100.00
04/04/07	SFL	Receipt and review e-mail from Attwood...re: deposition schedule	250.00	.20	50.00
04/04/07	SFL	Telephone conversation with Attwood...re: deposition schedule	250.00	.50	125.00
04/23/07	SFL	Telephone conversation with client...re: depositions update	250.00	.40	100.00
05/01/07	SFL	Receipt and review from Court re: Motion for Extension of Time To File Discovery by Plaintiff	250.00	.40	100.00
05/02/07	SFL	Receipt and review from Court...granting extension	250.00	.20	50.00
05/03/07	SFL	Receipt and review from Court...Notice of Appearance by Brian Webb	250.00	.20	50.00
05/17/07	SFL	Receipt and review from Court...Motion for Extension of Discovery by Plaintiff	250.00	.40	100.00
05/18/07	SFL	Receipt and review from Court...Extension request granted	250.00	.20	50.00
06/03/07	SFL	Telephone conference with client...re: deposition of Chief Williamson	250.00	.40	100.00

06/04/07	SFL	Telephone conference with Atkins...re: deposition of Chief Williamson	250.00	.50	125.00
06/04/07	SFL	Preparation of letter to Gwinnett County DA office...re: open records request on Brookover file	250.00	.50	125.00
06/04/07	ABL	Fax open records request to Gwinnett County DA's office	100.00	.15	NC
06/04/07	SFL	Telephone conversation with client...re: depositions	250.00	.40	100.00
06/07/07	SFL	Telephone conversation with client...re: Higgins interview	250.00	.50	125.00
06/08/07	SFL	Preparation for and phone interview with Higgins in Colorado	250.00	1.50	375.00
06/08/07	SFL	Telephone conversation with client...re: Higgins interview	250.00	.50	125.00
06/11/07	SFL	Telephone conference with Atkins...re: deposition preparation of Walls and Higgins interview	250.00	4.00	1000.00
06/11/07	SFL	Travel to Gwinnett County DA office to inspect Brookover file 4 hours travel, 1 hour meeting	250.00(travel ½) 250.00(meeting)	4.00 1.00	500.00 250.00
06/11/07	ABL	Delivery to court reporter Higgins interview tape to be transcribed	100.00	.50	NC
06/13/07	SFL	Preparation for Walls and Shetterly depositions	250.00	10.00	2500.00
06/13/07	SFL	Request and receipt from P.O.S.T. , training records of Walls And Dellinger	250.00	.50	125.00
06/14/07	SFL	Deposition of Walls, 6 hours travel (Athens)	250.00 250.00(travel ½)	10.00 6.00	2500.00 750.00
06/15/07	SFL	Deposition of Shetterly 6 hours travel (Athens)	250.00 250.00(travel ½)	8.00 6.00	2000.00 750.00
06/18/07	SFL	Telephone conference with Atkins...re: depositions	250.00	.50	125.00
06/18/07	ABL	Retrieval from court reporter, Higgins transcript	100.00	.50	NC
06/18/07	SFL	Receipt and review Higgins transcript	250.00	.50	125.00
06/18/07	SFL	Telephone conversations with clients...re: Higgins interview	250.00	.50	125.00
06/19/07	PLS	Fax Higgins transcript to Bill Atkins for his review	100.00	.15	15.00
06/25/07	ABL	Fax Higgins transcript to client	100.00	.15	NC
06/25/07	SFL	Telephone conversation with client...re: Higgins interview	250.00	.20	50.00
06/28/07	SFL	Telephone conference with client...re: status update on motions, depositions and discovery	250.00	1.00	250.00
09/28/07	ABL	Retrieval of case law cited in Motion and Brief in Support of Summary Judgment	100.00	2.00	200.00

09/28/07	SFL	Receipt and review Defendant's Motion for Summary Judgment	250.00	4.00	1000.00
10/02/07	SFL	Legal research on issues raised in Defendant's Motion For Summary Judgment	250.00	4.00	1000.00
10/02/07	SFL	Receipt and review Defendant's Brief in Support of Motion for Summary Judgment	250.00	3.00	750.00
10/10/07	SFL	Legal research on issues raised in Motion for Summary Judgment	250.00	3.00	750.00
10/11/07	SFL	Telephone conference with client...re: summary judgment issues	250.00	.20	50.00
10/16/07	SFL	Receipt and review E-mail from Atkins...re: extension request to file response to Summary Judgment Motion	250.00	.20	50.00
11/30/07	SFL	Receipt and review from Court... Motion to Extend filing of Summary Judgment Motion and Court's granting the request	250.00	.40	100.00
11/30/07	SFL	Receipt and review Defendant's Motion for Filing of Excessive pages	250.00	.20	50.00
12/03/07	SFL	Receipt and review from Court, order granting Defendant's Motion to file excess pages	250.00	.20	50.00
12/04/07	SFL	Receipt and review from Court... Notice of filing original discovery by Plaintiff	250.00	.20	50.00
12/05/07	ABL	Legal research, pulling case files for Summary Judgment review	100.00	2.00	200.00
12/06/07	SFL	Receipt, review and legal research on Plaintiff's Response to Defendants	250.00	2.00	500.00
12/07/07	SFL	Receipt & review Statement of material facts as to which there is no dispute, Brief in Opposition to Defendant's Motion For Summary Judgment, Plaintiff's Reply to Defendant Jimmy Williamson's Supplement to Defendant's Motion For Summary Judgment and Plaintiff's Statement of Material Facts as to which these remain genuine issues to be tried	250.00	4.00	1000.00
12/10/07	SFL	Receipt and review e-mail from client...re: brief and documents requesting call to address concerns	250.00	.20	50.00
12/10/07	SFL	Telephone call to clients to address question and concerns re: Summary judgment	250.00	.50	125.00
12/12/07	SFL	Receipt and review from Court, filing by Plaintiff depositions of Shetterly, Schramski, Hedgelton, Humpries, Leiter, Walls, Stafford, Welzelberger and Exhibits 29-36 – review of depositions	250.00	8.00	2000.00
12/14/07	SFL	Receipt and review e-mail from client...re: similar P Card investigations	250.00	.50	125.00
12/19/07	SFL	Receipt and review... Court Order granting extension of time to file reply to Motion For Summary Judgment	250.00	.20	50.00

01/11/08	SFL	Receipt and review Defendant's reply to Plaintiff's brief in Opposition to Defendant's Motion For Summary Judgment and Defendant's Response to Plaintiff's Statement of Material Facts. Legal research	250.00	3.00	750.00
01/14/08	SFL	Receipt and review r-mail from client with attachments...UGA's Response to Plaintiff's Statement of Material Facts and Defendant's Reply to Plaintiffs Brief in Opposition to Motion for Summary Judgment	250.00	1.50	375.00
01/14/08	SFL	Telephone conversation with client...re: e-mail contents And Motion For Summary Judgment issues	250.00	.50	125.00
01/14/08	SFL	Receipt and review from Court... Notice of Error in Filing Memorandum	250.00	.20	50.00
01/15/08	SFL	Receipt and review from Court... Notice of Memo in Opposition to Statement of Disputed Material Facts	250.00	.20	50.00
01/15/08	SFL	Receipt and review updated attorney expense statement and correspondence from Atkins	250.00	.40	100.00
01/15/08	SFL	Telephone conversation with client...re: expense statement	250.00	.40	100.00
01/15/08	SFL	Receipt and review updated attorney expense statement	250.00	.50	125.00
03/04/08	SFL	Telephone conversation with client...re: status update	250.00	.50	125.00
04/02/08	SFL	Telephone conference with client...re: choice in representation after Atkin's withdrawal from law firm	250.00	1.00	NC
04/02/08	SFL	Telephone conference with Parks...re: representation	250.00	.40	NC
04/02/08	SFL	Receipt and review fax from Nieset...re: correspondence from Parks to client	250.00	.40	NC
04/02/08	SFL	Telephone conference with client...re: representation selection	250.00	.50	NC
04/03/08	SFL	Receipt and review from Court... depositions of client by Defendant. Review of deposition	250.00	4.00	1000.00
04/03/08	SFL	Receipt and review from Court... depositions of Williamson Filed by Plaintiffs	250.00	1.00	250.00
04/04/08	SFL	Telephone conversation with Akins...re: representation selection	250.00	.50	NC
04/05/08	SFL	Meeting in Atlanta with Atty. Parks and clients...re: Trial strategy and status update, 4 hours drive & 1 hour meeting	250.00(travel ½)	4.00	500.00
			250.00(meeting)	1.00	250.00
04/11/08	SFL	Receipt and review from Court... Motion for Extension Filing pre-trial order by Plaintiff	250.00	.20	50.00

05/12/08	SFL	Receipt and review Plaintiff's reply to Response filed re: Motion For Summary Judgment	250.00	.40	100.00
06/13/08	SFL	Receipt and review from court...ORDER on Defendant's Motion For Summary Judgment. Conferences with client and Parks...re: Court Order on Motion For Summary Judgment	250.00	2.00	500.00
06/16/08	SFL	Telephone conference with Parks...re: Summary Judgment Order and qualified immunity concerns	250.00	.50	125.00
06/18/08	SFL	Preparation and fax to Parks, re: client's financial loss as a result of illegal arrest	250.00	.50	125.00
07/11/08	SFL	Receipt and review from Court... Order setting pre-trial conference	250.00	.20	50.00
07/21/08	SFL	Receipt and review updated financial loss statement from client	250.00	.40	100.00
07/21/08	SFL	Telephone conversation with client...re: financial loss And proposed settlement	250.00	.40	100.00
07/23/08	PLS	Trial preparation, review case file, pull and copy documents, organize witness information with corresponding exhibits into file folders and label each file for retrieval purposes	100.00	5.00	500.00
07/28/08	SFL	Receipt and review of settlement consideration by client, fax to Parks client's loss statement	250.00	.50	125.00
07/28/08	SFL	Telephone conversation with clients...re: settlement proposal	250.00	1.00	250.00
07/29/08	SFL	Receipt and review electronic filing of Notice of Attorney Appearance by Eleanor Attwood	250.00	.20	50.00
07/29/08	SFL	Receipt and review e-mail from Parks to Webb... re: settlement proposal	250.00	.40	100.00
07/29/08	SFL	Telephone conversion, with client...re: settlement proposal	250.00	.20	50.00
07/30/08	SFL	Receipt and review from Court... order denying extension of time	250.00	.20	50.00
08/12/08	SFL	Receipt and review Plaintiff and Defendant's proposed voirdire questions and requests for charge and proposed pre-trial order	250.00	1.00	250.00
08/12/08	SFL	Receipt and review E-mail from Parks, re: revised jury charges	250.00	.40	100.00
08/14/08	SFL	Receipt and review proposed pre-trial order including proposed voirdire, jury instructions, exhibit list, stipulation of facts, trial order, Plaintiff and Defendant's Exhibit List and Plaintiff's brief and subsequent outline of case and contention	250.00	2.00	500.00
08/19/08	SFL	Pretrial conference in Columbus, GA, 6 hours travel, ½ conf.	250.00 (travel ½) 250.00 (meeting)	6.00 .50	750.00 125.00

08/20/08	SFL	Receipt and review from Court... Pre-Trial Order	250.00	1.00	250.00
08/21/08	SFL	Receipt and review of Park letter to Webb re: pre-trial conference Research and attorney fees	250.00	.40	100.00
08/29/08	SFL	Trial preparation criminal case file including all exhibits, statements, UGA police file, DA file	250.00	3.00	750.00
09/03/08	SFL	Trial preparation criminal case file review including all exhibits, statements of witnesses, UGA policy file, DA file	250.00	3.00	750.00
09/04/08	SFL	Telephone Conference with client...re: status update	250.00	.20	50.00
09/10/08	SFL	Draft and send correspondence to Parks scheduling and confirming meeting on 9/11/08	250.00	.40	100.00
09/10/08	SFL	Preparation for trial- review depositions and exhibits of Williamson, Walls, Buckner, Shetterly, Leiter, Humphreys, Hedgeton, Wetzelsberger and Stafford	250.00	7.00	1750.00
09/10/08	SFL	Telephone conference with client...re: trial strategy, status update and settlement negotiations	250.00	.50	125.00
09/11/08	SFL	Receipt and review e-mail from Parks requesting assistance in speaking to potential witness Higgins and reviewing her separation papers from UGA	250.00	.40	100.00
09/11/08	SFL	Telephone conference call with Parks... re: trial preparation, deposition review and pre-trial preparation	250.00	.50	125.00
09/11/08	SFL	Travel to Atlanta to meet with Parks, 3 hours travel, meeting with Parks, pretrial strategy, 1 hour	250.00(1/2 travel) 250.00(meeting)	3.00 1.00	375.00 250.00
09/12/08	SFL	Receipt and review depositions of Holly Schramski and Dellinger	250.00	3.00	750.00
09/12/08	SFL	Telephone conference with client...re: Higgins testimony and status update	250.00	.50	125.00
09/12/08	SFL	Pre-trial preparation, review of depositions, exhibits, motions & witness list	250.00	5.00	1250.00
09/16/08	SFL	Receipt and review from Parks exit interview of Higgins	250.00	.50	125.00
09/18/08	SFL	Preparation and sending open records act request to Gwinnett County DA's office re: Tammy Brookover	250.00	.40	100.00
09/18/08	SFL	Receipt and review e-mail from client...re: press release	250.00	.20	50.00
09/18/08	SFL	Telephone call to client...re: press release	250.00	.50	125.00
09/19/08	ABL	Fax to Parks office Holly Higgins interview	100.00	.20	NC
09/19/08	SFL	Trial Preparation – review of depositions, exhibits and criminal case file	250.00	8.00	2000.00

09/20/08	SFL	Trial preparation – preparation for cross examination, voirdire deposition and exhibits review	250.00	5.00	1250.00
09/21/08	SFL	Trial preparation – review of witness statements, voirdire preparation, prepare for cross examination of witnesses with exhibits, review of depositions	250.00	5.00	1250.00
09/23/08	SFL	Retrieval and fax to Parks UGA fraud policy and research policy	250.00	.50	125.00
09/23/08	SFL	Receipt and review Park's request for pre-trial settlement conference	250.00	.50	125.00
09/23/08	SFL	Telephone conference with Parks...re: pre-trial preparation review	250.00	.20	50.00
09/23/08	SFL	Trial preparation, review depositions and preparation for cross examination of witnesses	250.00	4.00	1000.00
09/24/08	SFL	Travel to Atlanta to review Brookover file at Gwinnett County DA's office, 4 hours drive time, 1 hour meeting	250.00(1/2 travel)	4.00	500.00
09/25/08	SFL	Receipt and review from Court notice of Motion for Hearing/Settlement conference	250.00(1 meeting)	1.00	250.00
09/26/08	SFL	Receipt and review Plaintiff's Consent Motion to Amend pre-Trial Order (plaintiff's witness list)	250.00	.40	100.00
09/26/08	SFL	Receipt and review file of Tamara Brookover from Gwinnett County DA's office	250.00	.40	100.00
09/26/08	SFL	Pre-Trial preparation – deposition review, case file review, preparing outline for cross examination of witnesses, review of exhibits and jury questions	250.00	6.00	1500.00
09/26/08	SFL	Receipt and review from Court, Notice of Jury questionnaire and Motion to Amend Pre-trial Order	250.00	.40	100.00
09/27/08	SFL	Trial preparation – deposition review, telephone conversation with clients...re: trial strategy	250.00	4.00	1000.00
09/28/08	SFL	Pre-Trial preparation – depositions review, exhibit review, witness Statement review, voir'dire review	250.00	6.00	1500.00
09/29/08	SFL	Receipt and review Court e-mail advising of placement on trial calendar and jury questionnaire	250.00	.20	50.00
09/29/08	SFL	Receipt and review from Court... Parks Motion to Amend Pre-Trial Order adding myself as possible witness	250.00	.20	50.00
09/29/08	SFL	Receipt and review Court's granting amended pre-trial order	250.00	.20	50.00
09/30/08	SFL	Fax to Attwood DTAE correspondence regarding terminating client from employment	250.00	.20	50.00
09/30/08	SFL	Draft correspondence to Gwinnett County DA office for reviewing client case file before trial	250.00	.40	100.00

09/30/08	SFL	Telephone call to Gwinnett County DA's office to request file on client	250.00	.50	125.00
09/30/08	SFL	Correspondence from Parks regarding going to trial and request for preparation of outline on my direct examination as a witness	250.00	.40	NC
09/30/08	PLS	Prepared S. Lanier expertise statement as witness GCIC prepared	100.00	2.00	200.00
09/30/08	ABL	Faxed request from client to sign GCIC form to check on expungement	100.00	.50	NC
9/30/08	SFL	Trial Preparation... criminal case file review, review of statements Of witness, deposition testimony	250.00	6.00	NC
10/01/08	SFL	E-mail to potential witness associate of Holly Higgins, receipt of E-mail response from potential witness. Fed ex package sent to Parks containing potential witnesses response and prosecution dismissed papers from Gwinnett County DA's office and certified copy of GCIC report on Plaintiff	250.00	1.00	250.00
10/01/08	SFL	Telephone call from Gwinnett County DA's office acknowledging receipt of Open Records request on client file	250.00	.40	100.00
10/01/08	SFL	Trial preparation...review of depositions, exhibits. cross examination of witnesses, criminal case file review... (Note: preparation necessary in the event that withdrawal as Attorney and acceptability as witness not approved by the Court)	250.00	8.00	NC
10/02/08	SFL	Receipt and review electronic filing by Court of amended jury instruction	250.00	.20	50.00
10/02/08	SFL	Telephone conference with clients...re: trial preparation and strategy	250.00	.20	50.00
10/03/08	SFL	Receipt and review ...Motion to Amend/Correct Pre-Trial Order	250.00	.20	50.00
10/03/08	SFL	Telephone call with Gwinnett Count DA's Office...re: client file review...informed that file could not be located- no reasonable explanation given	250.00	.50	125.00
10/03/08	SFL	Preparation of and sending proposed witness question outline to Parks	250.00	.40	NC
10/03/08	SFL	Receipt and review Parks E-mail re: issues, to be covered on witness examination	250.00	.40	NC
10/03/08	SFL	Draft and send e-mail to Parks...re: withdrawal from representation	250.00	1.00	NC
10/06/08	SFL	Receipt and review Parks E-mail...re: withdrawal from representation	250.00	.40	NC
10/06/08	SFL	Withdrawal as counsel			

RECAPITULATION

FEES

Total Fees..... \$65,240.00

EXPENSES

Pacer Services 23.76

Faxes 171.00

Photocopies at 20 cents per page, 9 reams @500 per ream: 4,500 copies x. 20 900.00

Transcripts – Holly Higgins 140.00

Filing Fee..... 175.00

Certified Mail Receipt..... 55.80

Gwinnett County DA's Office..... 72.50

Open Records Request 148.33

Post Council..... 2.75

Federal Express Charges (9 Deliveries) 283.22

Total Expenses..... \$1,972.36

TOTAL CHARGES WORK PRODUCT & EXPENSES..... \$67,212.36